



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

February 15, 2008

Bryan Jeffrey, Treasurer  
Huckabee for President Inc.  
P.O. Box 2008  
Little Rock, AR 72203

Response Due Date:  
March 17, 2008

Identification Number: C00431809

Reference: Year End Report (10/1/07 - 12/31/07)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following item:

- Schedule A-P of your report discloses one or more contributions that appear to exceed the limits set forth in the Act (see attached). You should examine all of your contributions to check for additional excessive contributions. The Committee's procedures for processing contributions should also be reviewed.

An individual or a political committee other than an authorized committee or qualified multi-candidate committee may not make a contribution to a candidate for federal office in excess of \$2,300 per election. An authorized committee may not make a contribution to a candidate for federal office in excess of \$2,000 per election. A qualified multi-candidate committee and all affiliated committees may not make a contribution(s) to a candidate for federal office in excess of \$5,000 per election. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §§ 441a(a) and (f); 11 CFR §§ 110.1(b), (e) and (k))

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you must amend your original report with the clarifying information. If any contribution you received exceeds the limits, you may have to refund the excessive amount.

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Excessive contributions may be retained if within sixty (60) days of receipt, the excessive portions are properly redesignated or reattributed. Guidelines for each option are provided below:

For reattributions, excessive contributions from individuals can be retained, if within sixty (60) days of receipt, the excessive amount is properly reattributed to another person. Please note that reattributions only apply to excessive contributions from individuals. An excessive contribution is considered properly reattributed if (1) the contributors provide the committee with written documentation, signed by each contributor, authorizing a reattribution and indicating the amount of the contribution to be attributed to each contributor, or (2) the committee reattributes, by presumption, the excessive portion of the contribution if the contribution was made on a written instrument from a joint account and was signed by only one of the account holders. In this case, the treasurer must notify the contributors in writing within 60 days of receiving the contribution that the committee intends to reattribute the excessive portion and must give the contributor an opportunity to request a refund. (11 CFR § 110.1(k)(3)(ii)(B))

For redesignations, the funds can be retained if within sixty (60) days of receipt the excessive amount is properly redesignated for a different election. An excessive contribution is considered properly redesignated if (1) the committee obtains signed written documentation from the contributor(s) authorizing the redesignation of the contribution for another election, provided that the new designation does not exceed the limitations on contributions made with respect to that election, or (2) your committee redesignates by presumption the excessive portion of the contribution for another election provided that the new designation does not exceed the limitations on contributions made with respect to that election. In this case, the treasurer must notify the contributor of the redesignation in writing within 60 days of the treasurer's receipt of the contribution. The notification must give the contributor an opportunity to request a refund. (11 CFR § 110.1(b)(5)(ii)(B)) Please note that you cannot presumptively redesignate an excessive contribution from a multi-candidate committee. Also, a contribution can only be redesignated to a previous election to the extent that the contribution does not exceed the committee's net debts outstanding for that election. (11 CFR § 110.1(b)(3)(i))

If the foregoing conditions for reattributions or redesignations are not met within 60 days of receipt of the contribution, the excessive amount must be refunded. See 11 CFR § 103.3(b)(3).

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Please inform the Commission of your corrective action immediately in writing and provide photocopies of any refund checks and/ or letters reattributing or redesignating the contributions in question. Refunds are reported on Line 28 of the Detailed Summary Page and on a supporting Schedule B-P of the report covering the period in which they are made. Redesignations and reattributions are reported as memo entries on Schedule A-P of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR §§ 104.8(d)(2), (3) and (4))

The acceptance of excessive contributions is a serious problem. Again, the committee's procedures for processing contributions should be examined and corrected in order to avoid this problem. Although the Commission may take further legal action, prompt action by you to refund, redesignate, and/or reattribute of the excessive amount will be taken into consideration.

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1175.

Sincerely,



Travis F. Brown  
Senior Campaign Finance Analyst  
Reports Analysis Division

Excessive and/or Prohibited Contributions  
Huckabee for President Inc. (C00431809)  
Year End Report (10/1/07 - 12/31/07)

P = Primary Election  
G = General Election

CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
Charles M.	Alter	12/17/2007	4600	P2008
Jack	Biddle	11/28/2007	2500	P2008
David	Borden	11/19/2007	1500	P2008
David	Borden	12/17/2007	3000	P2008
Peggy	Bost	4/21/2007	2300	P2008
Peggy	Bost	6/25/2007	1000	P2008
Fred	Broling	11/12/2007	1500	P2008
Fred	Broling	11/12/2007	1500	P2008
Jerri L.	Buechley	12/19/2007	2600	P2008
Scottie	Cahill	12/27/2007	500	P2008
Scottie	Cahill	12/28/2007	2300	P2008
Brian	Daiagi	12/26/2007	1500	P2008
Brian	Daiagi	12/26/2007	1500	P2008
David	Dunkel	10/18/2007	500	P2008
David	Dunkel	11/29/2007	2300	P2008
Robert	Farrell	12/10/2007	570	P2008
Robert	Farrell	12/17/2007	2300	P2008
Ann G.	Henderson	11/2/2007	300	P2008
Ann G.	Henderson	12/31/2007	2300	P2008
Ann G.	Henderson	8/24/2007	1000	P2008
Stanley M.	Herzog	12/6/2007	4600	P2008
Josh	Huffman	12/10/2007	570	P2008
Josh	Huffman	12/11/2007	2300	P2008
Jon	Johnson	12/26/2007	2300	P2008
Jon	Johnson	12/26/2007	2300	P2008
Sara G.	Kuykendall	10/30/2007	500	P2008
Sara G.	Kuykendall	12/28/2007	2300	P2008
Monte	McDowell	12/28/2007	4600	P2008
Berry	Meguiar	12/19/2007	4000	P2008
Pam	Mehrdad	12/28/2007	4600	P2008
James	Patterson	10/18/2007	500	P2008
James	Patterson	11/15/2007	500	P2008
James	Patterson	11/30/2007	100	P2008
James	Patterson	12/14/2007	250	P2008

Excessive and/or Prohibited Contributions  
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CONTRIBUTOR NAME		DATE	AMOUNT	ELECTION
James	Patterson	12/26/2007	1200	P2008
Bradford A.	Phillips	12/31/2007	4600	P2008
Steve	Riggle	12/1/2007	4600	P2008
Ann	Ritterbush	10/29/2007	2300	P2008
Ann	Ritterbush	11/30/2007	500	P2008
Mark	Seymour	11/11/2007	4600	P2008
Jerry V.	Shields Jr.	12/11/2007	4600	P2008
Jack	Sisemore	7/27/2007	1800	P2008
Jack	Sisemore	8/9/2007	1000	P2008
Donald E.	Spence	11/8/2007	2000	P2008
Donald E.	Spence	12/14/2007	1000	P2008
Larry	Stockstill	11/7/2007	4600	P2008
Mark	Sutherland	12/17/2007	4600	P2008
Dorothy	Tompkins	12/28/2007	4100	P2008
Jeffrey	Weller	12/19/2007	3600	P2008
Jeffrey	Weller	9/7/2007	1000	P2008
Jim	Williams	11/8/2007	1000	P2008
Jim	Williams	12/14/2007	2800	P2008
Reed	Williams	12/14/2007	2300	P2008
Reed	Williams	12/17/2007	2300	P2008
John W.	Wisenbaker Jr.	10/22/2007	1500	P2008
John W.	Wisenbaker Jr.	11/29/2007	500	P2008
John W.	Wisenbaker Jr.	9/6/2007	500	P2008
John	Wisenbaker Sr.	10/26/2007	1800	P2008
John	Wisenbaker Sr.	11/28/2007	100	P2008
John	Wisenbaker Sr.	9/6/2007	250	P2008
John	Wisenbaker Sr.	9/19/2007	250	P2008
Lannin J.	Zoltenko	10/22/2007	2300	P2008
Lannin J.	Zoltenko	12/14/2007	1150	P2008

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